

BEFORE THE
Federal Communications Commission
WASHINGTON, D. C. 20554

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Federal Communications Commission
Office of the Secretary

In the Matter of)
)
Amendment of Rule 90.235)
to make available to licensees) RM-
in the Manufacturers Radio)
Service Secondary Fixed)
Tone Signalling and Alarm)
Operations)

To: The Commission

PETITION FOR RULEMAKING

Manufacturers Radio Frequency Advisory Committee, Inc. ("MRFAC"), by its attorneys, hereby requests initiation of a rulemaking which looks toward liberalization of Rule 90.235 so as to benefit Manufacturers Radio Service eligibles.

BACKGROUND

As the Commission is aware, MRFAC is the certified frequency coordinating committee for the Manufacturers Radio Service ("MRS") and also the representative association of MRS licensees.

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MRFAC's membership comprises a cross-section of the manufacturing industry in the country. Member firms range from large national and multi-national corporations to much smaller companies. Member firms are found in all parts of the country, in both urban and rural areas; and while some member firms manufacture primarily one product, others have diversified operations.

In Comments filed June 20, 1988 in RM-6380, MRFAC expressed qualified support for a proposal by Forest Industries Telecommunications ("FIT") to expand Rule 90.235 so as to allow Forest Products Radio Service eligibles to transmit point-to-point tone impulse and alarm signals on a secondary basis on land mobile frequencies above 25 MHz. However, MRFAC urged that the proposal be broadened to include not just Forest Products eligibles, but also manufacturers generally. MRFAC observed that MRS eligibles have every bit as much need for a secondary alarm signalling capability as Forest Products entities, and as the Public Safety, Power and Petroleum licensees which are already allowed such flexibility.

MRFAC went on to suggest certain other qualifications. In particular, MRFAC urged that each transmission for any one alarm, warning or corrective action be limited to five repetitions, as opposed to the three repetitions suggested by FIT. MRFAC observed that Power Radio Service eligibles were allowed five repetitions and that, given the variety of manufacturing operations conducted by MRS eligibles, as well as the important safety issues at stake, MRS eligibles should be allowed the same number of repetitions.

MRFAC recognized that the changes it proposed could possibly be viewed as outside the scope of the FIT Petition. Hence, MRFAC advised that out of an abundance of caution, it would file its own petition regarding Rule 90.235. This filing fulfills that representation.

DISCUSSION

Little more need be added at this juncture in support of MRFAC's proposal. As noted previously, manufacturers generally--whether they be loggers or automobile

manufacturers--all have safety and efficiency concerns which could be satisfied by the proposed secondary alarm signalling.

For example, in a typical automotive operation secondary alarm transmissions could be utilized to alert supervisors to a malfunction on the assembly line. Similarly, radio units could be utilized to activate remote fire alarms, and remote theft or pilferage alarms. Radio units of the type described here could also be used to transmit emergency calls to plant medical personnel in the event an employee suffers a serious injury or other health emergency.

In short, there is ample justification for the request made here.

In consideration of spectrum efficiency concerns, MRFAC urges the Commission to adopt a provision to ensure that the limit of five repetitions for any one alarm or similar event not be exceeded. Specifically, MRFAC urges that language be incorporated in the Rule requiring the use of an automatic mechanism for preventing any more than five transmissions of two

seconds each. A device of this nature is especially important in those instances where operating sites are in remote locations many miles from the plant or mill. In such cases, it can take hours for maintenance or repair crews to reach the site. Given the fact that such radios are often located on high terrain and can have an effective coverage radius of 100 miles or more, "secondary" alarm transmissions from unattended wilderness sites could knock out primary land mobile operations in a vast area for a extended period. This would not only subvert the purported secondary nature of such transmitters and be spectrally wasteful, but it is also entirely unnecessary. After all, the purpose of the Rule is served by allowing secondary transmissions for the briefest possible time--just long enough to activate an alarm at a remote, manned receiving site. For this purpose, the limit of five two-second repetitions per alarm event is clearly sufficient. What is needed, however, is a more effective means of ensuring compliance with the Rule in situations such as that described above; hence, an automatic shut-down device should be required. This requirement should be applicable to all manufacturers including MRS and Forest Products licensees.

CONCLUSION

Accordingly, for the foregoing reasons, MRFAC urges the Commission to issue a notice of proposed rulemaking looking toward the changes proposed in the Appendix hereto.

Respectfully submitted

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APPENDIX

Rule 90.235 would be amended as follows:

First, the introductory material to the Rule would add a reference to the Manufacturers Radio Service.

Second, a new subsection (c) would be added as follows:¹

In the Manufacturers Radio Service the purposes for which such secondary signalling may be used are:

- (1) indication of failure of equipment or services used in the facilities of the licensee;
- (2) indication of abnormal conditions in the manufacture or transportation processes or facilities of the licensee;
- (3) indication of medical emergencies;
- (4) transmission from the point where alarms or other operational data are received as may be necessary to verify status of equipment or processes; verify or adjust operating conditions; restore lost service; place standby equipment in operation; or to correct any abnormal conditions which would otherwise result in the immediate or continued failure in the licensee's operations;
- (5) confirmation of status or operating conditions or that an operation or correction intended to be accomplished in paragraph (4) above has occurred.

Current subsection (c) should be redesignated subsection (d) and a new Paragraph 7 added which would read:

- (7) For systems authorized in the Manufacturers Radio Service, each transmission for any one alarm, warning or corrective action or requirement or for another purpose set forth in subsection (c) of this section, shall be limited to a maximum duration of 2 seconds and shall not be repeated more than five times. An automatic device shall be utilized to ensure that this limitation is complied with.

^{1/} The subsection designations would differ should the revisions requested by FIT also be adopted.